

March 14, 2014

Chip Humphrey
U.S. Environmental Protection Agency, Region 10
805 SW Broadway, Suite 500
Portland, OR 97205

Kristine Koch
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900, M/S ECL-115
Seattle, WA 98101

**Re: Lower Willamette River, Portland Harbor Superfund Site
USEPA Docket No: CERCLA-10-2001-0240
Monthly Progress Report for February 2014**

Dear Mr. Humphrey and Ms. Koch:

This monthly status report provides information required by the Portland Harbor Superfund Site Administrative Settlement and Administrative Order on Consent (ASOC).

1. ACTIONS TAKEN IN FEBRUARY 2014

- None.

Deliverables Approved by EPA

- None.

Deliverables Submitted to EPA and Other Actions

- On February 3, 2014, the LWG provided EPA a revised draft Feasibility Study (FS) process matrix.
- On February 6, 2014, the LWG provided EPA the status of action items and administrative tools for managing the FS revision process.
- On February 7, 2014, the LWG provided EPA a draft FS process dates matrix, status work items, and backup sheets FS issues table and Gantt chart.
- An FS technical meeting was held with EPA on February 11, 2014.
- On February 12, 2014, the LWG provided EPA the status of the LWG response to EPA's November 20, 2013 FS supplemental information requests.
- On February 12, 2014, the LWG provided EPA a revised draft FS process dates matrix, LWG draft FS schedule, and redline draft FS process dates matrix.
- An LWG and EPA Senior Managers meeting was held on February 13, 2014.

- On February 13, 2014, the LWG provided EPA revised draft status, work items, and backup sheets.
- On February 13, 2014, the LWG provided EPA a suggested list of potential technical meeting topics to schedule in March.
- On February 14, 2014, the LWG provided EPA a draft FS revision process matrix.
- On February 21, 2014, the LWG provided EPA an updated FS revision process matrix.
- On February 21, 2014, the LWG provided EPA the LWG's initial questions on FS issue 2.2 ecological COC selections for discussion during the February 27, 2014 FS technical meeting.
- On February 21, 2014, the LWG provided EPA the LWG's initial questions on FS issue 2.2 human health COC selections for discussion during the February 27, 2014 FS technical meeting.
- On February 21, 2014, the LWG provided EPA the LWG's initial questions on FS issue 2.3.3 water PRGs for discussion during the February 27, 2014 FS technical meeting.
- On February 21, 2014, the LWG provided EPA the LWG's initial questions on FS issue 3.3.2 DDx RALs for discussion during the February 27, 2014 FS technical meeting.
- On February 21, 2014, the LWG provided EPA an updated FS revision process matrix.
- A conference call with EPA was held on February 21, 2014 to discuss the Remedial Investigation (RI) Section 5 surface water tables.
- A conference call with EPA was held on February 26, 2014 to discuss the RI Section 5 surface water presentation and figures.
- An FS technical meeting was held with EPA on February 27, 2014 to discuss contaminants of concern and background levels.
- On February 28, 2014, the LWG provided EPA an updated FS revision process matrix.
- On February 28, 2014, the LWG provided EPA an expanded discussion on the LWG's current technical position regarding FS issue 3.3.1 the BaPEq RAL application for discussion during the March 14, 2014 FS technical meeting.

Comments/Documents Provided by EPA

- On February 6, 2014, EPA provided an updated draft FS process matrix.
- On February 6, 2014, EPA notified the LWG that a revised FS process agreement would not be provided to the LWG until after the February 13, 2014 LWG and EPA Senior Managers meeting.
- On February 6, 2014, EPA provided the LWG an updated revision process for the final FS diagram.
- On February 10, 2014, EPA provided the LWG with revised text and a summary sampling event table for the RI Section 5 surface water subsection.
- On February 11, 2014, EPA provided the LWG an updated FS revision process diagram.

- On February 12, 2014, EPA acknowledged receipt of information provided by the LWG in response to items 1 (bed elevation comparisons), 6 (benthic areas), and 7 (native editable files for the draft FS) of EPA's November 20, 2013 FS supplemental information request.
- On February 13, 2014, EPA provided the LWG an updated FS revision process diagram.
- On February 19, 2014, Lori Cohen acknowledged that the process to complete the FS for the Portland Harbor site in part will identify when EPA comments/direction for changes will be transmitted that begins the AOC dispute process. While the process is being further considered and documented, EPA acknowledged that the technical discussion currently occurring on the FS does not trigger the 14-day allowance for the LWG to invoke dispute resolution under the AOC. EPA expects the FS process will be fully in place by the end of March.
- On February 25, 2014, EPA provided the LWG the analysis of the dioxin/Furan as TEQ RALs for the FS.
- On February 25, 2014, EPA provided the LWG the current list of COCs.
- On February 25, 2014, EPA provided the LWG the FS revision process diagram that was shared with the Senior Managers on February 13 and a draft narrative to accompany the diagram.
- On February 26, 2014, EPA provided the LWG the EPA evaluation of DDx.

2. PROBLEMS ENCOUNTERED, ANTICIPATED DELAYS, AND SOLUTIONS

- None.

3. RESULTS OF SAMPLING, TESTS, AND OTHER DATA RECEIVED

- None.

4. SCHEDULE FOR THE NEXT FOUR MONTHS

Work covered by the ASOC that is currently planned for March, April, May, and June 2014 includes the following:

- March 2014: This was the target date for EPA to complete tasks one through ten on the FS comment themes and process table developed by EPA in early February 2013. A new schedule for the FS revision process is under discussion with EPA, including new draft completion dates for identified tasks ranging from March to November 2014.
- March through June 2014: Focused technical FS subgroup meetings will be held.
- March 2014: Redline strike-out comments expected from EPA on Section 5 of the Draft Final RI.
- March 2014: Redline strike-out comments expected from EPA on Section 6 of the Draft Final RI.
- March, 2014: EPA and LWG to assess changes to RI Sections 5 and 6 and develop a process and schedule for revising Section 10, including LWG taking the lead on the first draft.
- March 24, 2014: Redline strike-out comments expected from EPA on Section 11 of the Draft Final RI.

- May 14, 2014: Redline strike-out comments expected on the Executive Summary of the Draft Final RI.

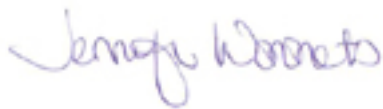
Submittal dates for pending documents currently under preparation by the LWG and scheduled for submittal in upcoming months are listed in Table 1: Status of Active LWG Deliverables—Portland Harbor RI/FS. This table includes pending and recently submitted deliverables for which EPA comments or approvals are required. Table 2: Status of LWG Deliverables—Portland Harbor RI/FS reflects the more complete list of LWG submittals and is equivalent to the former Table 1 provided in previous progress reports.

5. DOCUMENTS AND ISSUES AWAITING EPA RESPONSE

EPA comments or approvals have not been received on a number of documents that have been submitted to EPA as required by the ASOC; these submittals are listed in Tables 1 and 2. The LWG requests that EPA provide document approvals for these submittals to verify that the terms of the ASOC are being met and issues are resolved to maintain progress on the RI/FS. Also, the LWG believes that many of the documents listed as future submittals in Table 2 are no longer needed (see Status/Comments column) and requests that EPA review the list and confirm that these documents are, indeed, not needed.

If you have any questions, please give me a call at (503) 972-5014.

Sincerely,



Jennifer Woronets
LWG Administrative Project Coordinator

Copies:

Matt McClincy, ODEQ (email only)
Tom Gainer, ODEQ (email only)
Rob Neely, NOAA (email only)
Brian Cunnighame, Confederated Tribes of Warm Springs (email only)
Rose Longoria, Confederated Tribes of Yakama Nation (email only)
Julie Weis, Confederated Tribes of Siletz (email only)
Audie Huber, Confederated Tribes of Umatilla (email only)
J D Williams, Confederated Tribes of Umatilla (email only)
Brandy Humphreys, Grand Ronde (email only)
Kim D'Aquila, Grand Ronde (email only)
Erin Madden, Nez Perce Tribe (email only)
Colin Wagoner, Ridolfi (email only)
LWG Management
LWG Repository

Table 1. Status of Active LWG Deliverables – Portland Harbor RI/FS

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
None			

Notes:

¹ - **Bolded Deliverables** are primary deliverables per Section XIX, Paragraph 4 of ASOC (EPA 2001a).
 Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of ASOC.
Italicized Deliverables do not have stipulated penalty amounts.

² - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.

Table 2. Status of LWG Deliverables – Portland Harbor RI/FS

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
Round 1			
<i>Compilation of Information for Sources Between RM 11 and 11.6 East Bank of Portland Harbor</i>	November 2007	Submitted to EPA and DEQ 11/21/2007. Need written response from DEQ and EPA that upland sources are under investigation consistent with the Road to the ROD.	
Round 2 Biota			
<i>Revised Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i>	11/23/2005	Submitted 11/23/2005; approved with conditions on 12/6/2005; a final QAPP addendum is required	12/8/2005
<i>Final Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i>	TBD	On 2/9/2006, the LWG submitted a response to EPA's comments on the 11/23/2005 version of the QAPP addendum. The LWG has not heard back from EPA on that response. The LWG believes that a final QAPP is not required. Need EPA agreement that this final QAPP is not required.	
Hydro/Sed Modeling			
<i>Phase 2 Hydrodynamic Re-calibration Report</i>	May 2009	Submitted 5/7/2009; EPA comments received 7/22/2009	
Groundwater Pathway			
<i>Draft Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan</i>	4/22/2005	Submitted 4/22/2005; EPA comments received 6/3/2005	
<i>Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan - Response to EPA Comments</i>	TBD	Outstanding issues to be addressed in GW Appendix to Draft RI Report.	
<i>Revised Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan (including Appendix A - Site Summaries and Appendix B - Pilot Study Data Report)</i>	TBD	Outstanding issues to be addressed in GW Appendix to Draft RI Report.	

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i>	4/29/2005	Submitted 4/29/2005; EPA comments received 6/10/2005	
<i>Revised Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i>	No longer needed	The only seep determined to pose a potentially complete exposure pathway is discharge from Outfall 22B. The existing data from Outfall 22B include the upland COIs and meet the data quality requirements for risk evaluation (Category 1/QA2). Based on the Round 2 Report evaluations, no additional seep data are needed. Therefore, this FSP is no longer needed.	
<i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 2: Transition Zone Water FSP</i>	3/27/2006	Redline version submitted 3/27/2006; EPA needs to provide final approval of this FSP. This revised FSP was prepared and submitted after the associated field work was completed.	4/28/2006
<i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 3: Supplement to QAPP Addendum 3</i>	10/7/2005	Submitted 10/7/2005: Conditional approval of proposed changes to the QAPP addendum received from EPA on 9/30/2005. EPA needs to provide final approval of this QAPP. Approval to conduct sampling was provided by EPA on 9/30/2005.	
<i>Revised Transition-Zone Water FSP Addendum 1 Sampling Plans for ExxonMobil, Siltronic, Gasco, and Arkema</i>	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 9/30/2005. This revised FSP was prepared and submitted after the associated field work was completed.	
<i>Revised Transition-Zone Water FSP Addendum 2</i>	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 10/13/2005. This revised FSP was prepared and submitted after the associated field work was completed.	
Natural Attenuation			
<i>Step 2 Natural Attenuation Evaluation Report</i>	No longer needed		

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
Tech Memos			
Revised TRV Selection TM	10/23/2004	Submitted; EPA comments received 3/18/2005. On 6/10/2005, EPA directed the LWG to submit the final TRV Selection TM with the PRE. The final TRV Selection TM was submitted as an appendix to the 9/9/2005 PRE.	
Second Revision Preliminary Risk Evaluation Approach TM	1/7/2005	Submitted; EPA comments received 3/4/2005. On 6/10/2005, EPA directed the LWG to submit the final PRE approach TM with the PRE. The final PRE Approach was submitted as an appendix to the 9/9/2005 PRE.	
Comprehensive ERA Approach TM	6/27/2004	Submitted; EPA comments received 10/1/2004	
Revised Comprehensive ERA Approach TM	TBD	In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed.	
Process for Derivation of PRGs TM	1/20/2005	Submitted; EPA comments received 6/30/2006; a revised tech memo is not required.	3/21/2005
<i>Draft Approach to Determining Background for the Portland Harbor Superfund Site</i>	3/3/2006	Submitted 3/3/2006; EPA comments received 6/5/2006; revised tech memo required.	5/2/2006
<i>Revised Approach to Determining Background for the Portland Harbor Superfund Site</i>	7/20/2006	The revised approach to determining background for the Portland Harbor Superfund Site will be provided in the Draft RI Report	
<i>Process for Delineating the Extent of Contamination Upstream and Downstream of the ISA</i>		The approach for Delineating the Extent of Contamination Upstream and Downstream of the ISA will be provided in the Draft RI Report	
<i>COPC Selection Interim Deliverable</i>	~1/23/2006	In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed.	

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
ECOLOGICAL RISK ASSESSMENT			
Ecological Preliminary Risk Evaluation (PRE)	9/9/2005	Submitted 9/9/2005; EPA comments received 4/28/2006, a revised PRE is not required	11/8/2005
<i>Round 2 Benthic Assessment Interpretation Report</i>	3/17/2006	Submitted 3/17/2006; EPA comments received 7/6/2006	5/16/2006
<i>Food Web Modeling Report: Evaluating Trophic Trace and the Arnot and Gobas Models for Application to the Portland Harbor Superfund Site</i>	11/4/2005	Submitted 11/4/2005; EPA comments received 3/10/2006	1/3/2006
<i>Revised Ecological Water Screening Levels</i>	5/26/2006	Submitted 5/25/2006; directive EPA comments received 9/15/2006, and a correction to the xylene AWQC on 9/27/06. Additional revisions were submitted on 10/13/2006.	7/9/2006
Feasibility Study			
Literature Survey of Treatability Studies	October 2007	Submitted 10/31/2007. EPA comments received 2/15/08. A revised deliverable is not required, EPA comments indicated that they should be addressed in the FS.	Jan-08
<i>Round 3B (FS) Side-scan Sonar Data Report</i>	September 2008	Submitted 5/18/2009	
<i>Treatment Technologies Screening Table</i>	Early May 2009	Submitted 6/5/2009; EPA comments received 7/9/2009	7/6/2009
<i>Screening of Disposal Facilities for the Feasibility Study Memorandum</i>	Mid May 2009	Submitted 6/18/2009; EPA comments received 7/10/2009	7/2/2009
<i>Early Preliminary Remediation Goals (PRGs)</i>	Late March 2009	Submitted 3/27/2009	
<i>Benthic Toxicity AOPCs Check In Materials</i>	September 2010	Submitted 9/07/2010	
<i>Treatment Technology Evaluation Tools Memo</i>	-	Submitted 03/15/2011; EPA comments received 4/27/2011	

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>Draft Mitigation Determination Approach for Use in the FS Tools Memo</i>	-	Submitted 03/15/2011; EPA comments received 4/27/2011	
<i>Draft Feasibility Study Costing Approach Tools Memo</i>	-	Submitted 03/15/2011; EPA comments received 4/27/2011	
<i>Draft Identification of "COCs" and Contaminant Mobility Evaluation Criteria For the Draft FS Tools Memo</i>	-	Submitted 03/16/2011; EPA comments received 4/27/2011	
<i>Dredging Water Quality Evaluation Tools Memo</i>	-	Submitted 03/31/2011; EPA comments received 4/27/2011	
Alternatives Screening Materials		Submitted 04/06/2011	
Draft FS Key Elements Presentation	-	Submitted Materials 06/06/2011 Presentation 06/21 and 06/22/2011	
<i>EPA Directed Draft Feasibility Study (FS) Key Work Product</i>	01/15/2012	Submitted 01/16/2012	NA
Draft Feasibility Study (FS) - Electronic Version For Early EPA Team Review	03/20/2012	Submitted 03/20/2012	6/29/2012
Draft Feasibility Study (FS) - Formal Publically Accessible Submittal	03/30/2012	Submitted 03/30/2012 EPA initial comments received 12/18/2012.	6/29/2012
<i>Validated Analytical Results</i>	90 days following completion of each sampling activity		
Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report	2/21/2007	Submitted 2/21/2007. EPA comments on Sections 1-9 and Appendices A, B, C, D, F, and G received 1/15/08; comments on Section 10 received 3/20/08; comments on Section 11 received 5/16/08; comments on Appendix E received 8/8/08. This document was never intended to be revised or approved by EPA; comments will be addressed in the Draft RI Report.	
<i>Draft Sediment Mobility Testing Data Report</i>	August 2009	Submitted 8/11/2009	EPA comments not anticipated

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
Draft Baseline Ecological Risk Assessment Report	Early September 2009	Submitted 9/2/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010. EPA benthic approach comments received 09/27/2010.	11/2/2009
Draft Baseline Human Health Risk Assessment Report	Late September 2009	Submitted 9/23/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010.	11/23/2009
Draft Remedial Investigation Report	Late October 2009	Submitted 10/27/2009 EPA comments received 07/16/2010	12/27/2009
<i>Benthic Toxicity Reanalysis Technical Memorandum</i>	Mid November 2009	Submitted 11/13/2009 EPA benthic approach comments received 09/27/2010.	01/13/2009
<i>Supporting Electronic Information for Draft Benthic BERA</i>	November 2009	Submitted 11/19/2009	01/19/2010
Draft Final BHHRA	5/2/2011	Submitted 05/02/2011; EPA comments received 06/22/2012. EPA dispute decision received 12/07/12.	7/2/2011
Draft Final BERA	7/5/2011	Submitted 07/01/2011; EPA comments received 07/10/2012. EPA comments received on 12/21/2012. EPA comments received on 01/11/2013	9/1/2011
Human Health and Ecological Risk Management Recommendations	July 2011	Submitted 07/22/2011	9/22/2011

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
Draft Final Remedial Investigation Report	8/29/2011	Submitted 08/29/2011; EPA comments received on Section 1 and 2, Appendices A and H 11/30/2012 EPA comments received on Section 3 02/21/2013 EPA comments received on Section 4 03/19/2013 EPA comments received on Section 8 04/19/2013 EPA comments received on Section 9 8/16/2013 Revised Redline of EPA comments received on Section 9 9/26/2013 EPA comments received on Section 7 11/05/2013 Additional EPA comments received on Section 7 12/19/2013	10/29/2011
Final BHHRA	3/28/2013	Submitted: 02/11/2013 EPA comments received 02/15/2013 EPA conditional approval received on 02/26/2013. Final BHHRA posted and hardcopy submitted 03/25/13. EPA provided final approval of the BHHRA on 04/03/13 Final BHHRA errata posted 04/12/13.	4/8/2013
Final BERA	4/1/2013	Submitted: 04/01/2013; EPA comments received 06/07/13; Revised draft submitted to EPA 06/14/13 EPA comments received 06/26/13 EPA comments received 09/26/13 Further revised draft submitted to EPA 10/10/13 Further revised draft submitted to EPA 12/16/13 EPA provided final approval of the BERA with the exception of Attachment 1 Part B Communication Log on 12/20/13	4/15/2013
STORMWATER			
<i>Stormwater Loading Check-in Materials</i>	2/1/2009	Submitted 2/18/2009; EPA comments received 5/6/2009	
<i>Revised Stormwater Loading Calculation Methods</i>	April 2010	Submitted 04/30/2010; EPA comments received 08/17/2010	6/30/2010

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>Final Stormwater Loading Calculation Methods</i>		Submitted 01/31/2011: EPA comments received 03/02/2011 Revised Report Submitted 04/15/2011	3/31/2011
SEDIMENT			
<i>Round 3B Field Sampling Plan: Sediment Sampling and Benthic Toxicity Testing</i>		Submitted 5/4/2007; EPA comments received 7/25/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Upriver and Multnomah Channel Sediment Evaluation and Field Sampling Plan Technical Approach</i>		Submitted 5/25/2007; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Draft Round 3B Surface and Core Sediment FSP Preliminary Technical Memorandum</i>		Submitted 5/25/2007; EPA comments received 8/9/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Draft Round 3B Erosion Core Sediment FSP Technical Memorandum</i>	August 2007	Submitted 8/29/07; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Round 3B QAPP Addendum 10 for Sediment Sampling</i>	November 2007	Submitted 12/17/2007. Need EPA approval of this QAPP Addendum.	
<i>Round 3 Sediment Trap Deployment Field Report</i>		Submitted 06/30/2011	
FATE & TRANSPORT			
<i>Draft Chemical Fate & Transport Model Development and Data Gaps Identification Report</i>	July 2007	Submitted 7/20/2007; EPA comments received 10/15/07. LWG response to comments submitted 1/8/2008.	
<i>F&T Surface Sediment FSP – Addendum to 3B Sediment FSP</i>	December 2007	Submitted 12/10/2007; EPA comments received 1/2/08. 1/16/08 LWG agreed with EPA not to perform the sampling. Need EPA agreement that this deliverable is no longer needed.	
<i>Draft Bioaccumulation Modeling Report</i>		Submitted 7/27/2009	
CULTURAL RESOURCES			
<i>Draft Cultural Resource Survey Report</i>	12/16/2005	Submitted 12/16/2005	2/14/2006; EPA comments not time-critical at this point in the project

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
BIOLOGICAL ASSESSMENT			
<i>Preliminary Draft Site-Wide Biological Assessment - Electronic Version For Early EPA Team Review</i>	3/30/2012	Submitted 03/20/2012	6/29/2012
<i>Preliminary Draft Site-Wide Biological Assessment - Formal Publically Accessible Submittal</i>	3/30/2012	Submitted 03/30/2012	6/29/2012

Notes:

¹ - **Bolded Deliverables** are primary deliverables per Section XIX, Paragraph 4 of ASOC (EPA 2001a).

Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of ASOC.

Italicized Deliverables do not have stipulated penalty amounts.

² - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

Only deliverables due within the next four months are shown.

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.